

Patricia Murrow



Matt Blunt, Governor • Doyle Childers, Director

DEPARTMENT OF NATURAL RESOURCES

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June 4, 2007

CERTIFIED MAIL – 7004 1160 0000 8176 2944
RETURN RECEIPT REQUESTED

Curt Gardner, P.E.
Manager, Environmental Services
BASF
Agricultural Division
3150 Hwy JJ
Palmyra, MO 63461

RE: Incinerator "C" Effluent Release, BASF, Hannibal, Missouri
EPA ID No. MOD050226075



Dear Mr. Gardner:

The Missouri Department of Natural Resources' Hazardous Waste Program in consultation with the U.S. Environmental Protection Agency (EPA), Region VII, has reviewed BASF's letter dated May 16, 2007, in which BASF reported a release of liquid incinerator "C" effluent. This release, totaling approximately 20 gallons, to the ground resulted from two leaks in the effluent line over the uncontained portion of the piping. In addition to the information provided in the letter, the department is requesting that BASF submit a detailed map, drawn to scale, showing the effluent line, locations of the spill, and the area of contamination. Also, the department is requesting that BASF submit a copy of the Hazardous Waste Manifest(s) for disposal of the hazardous waste (excavated materials).

Based on the information in BASF's May 16, 2007, notification letter, and in accordance with Part II of the May 25, 1990, permit, Section 5, EPA and the department are requiring further investigation of this release. Within 45 calendar days of your receipt of this letter, BASF shall submit to the department a Sampling and Analysis Plan with an implementation schedule. Confirmation soil samples should be analyzed for all hazardous wastes constituents disposed of in the incinerator. The plan should also include the details and schedule for submitting an Investigation Report, including the results of the sampling and analysis. The Sampling and Analysis Plan will be reviewed for approval in accordance with the procedures set forth in the Part II May 25, 1990, permit, Section 13.

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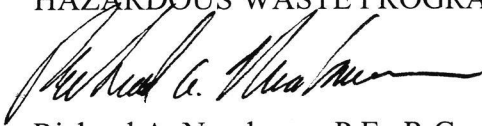
A copy of the detailed map, manifest(s), and Sampling and Analysis Plan with an implementation schedule must also be submitted to the following:

Ms. Patricia Murrow
U.S. Environmental Protection Agency, Region VII
ARTD/RCAP
901 North 5th Street
Kansas City, KS 66101

If you have any questions about this letter, please feel free to contact Mr. Assem Abdul at the Missouri Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102-0176, or by phone at (573) 751-3553. Ms. Patricia Murrow of the EPA, Region VII, may also be contacted for further information regarding this matter at (913) 551-7627.

Sincerely,

HAZARDOUS WASTE PROGRAM



Richard A. Nussbaum, P.E., R.G.
Chief, Permits Section

RAN:aam

c: Ms. Patricia Murrow, U.S. EPA, Region VII ✓